

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

MANHATTAN COUNTRY SCHOOL,
a/k/a MANHATTAN COUNTRY
SCHOOL, INC.,

Debtor.

Chapter 11

Case No. 25-11009 (DSJ)

**NOTICE OF PRESENTMENT OF
CONSENT ORDER RESOLVING ADP TOTALSOURCE GROUP INC.'S
MOTION SEEKING RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE, that a Consent Order (the “Consent Order”) resolving *ADP TotalSource Group Inc. ’s Motion for Relief from the Stay to Permit it to Terminate Client Services Agreement* (the “Motion”) [Docket No. 52], filed concurrently herewith, will be presented for signature to the Honorable David S. Jones, United States Bankruptcy Judge, Courtroom 701 at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004 on July 7, 2025 at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that objections, if any, to entry of the Consent

Order must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, with a hard copy delivered directly to the Chambers of the Honorable David S. Jones, and shall be served by e-mail upon: (i) Togut, Segal & Segal LLP, attorneys for the Chapter 7 Interim Trustee, One Penn Plaza, Suite 3335, New York, New York 10119, Attn: Neil Berger, Esq. (neilberger@teamtogut.com) and Eitan Blander, Esq. (eblander@teamtogut.com); (ii) Scarinci Hollenbeck, LLC, co-counsel to ADP TotalSource Group Inc, 519 8th Avenue, 25th Floor, New York, New York 10018, Attn: David Edelberg, Esq. (dedelberg@sh-law.com); (iii) William K. Harrington, United States Trustee for Region 2, Alexander Hamilton U.S. Custom House, One Bowling Green, Rm. 534, New York, NY 10004, Attn: Paul Schwartzberg (paul.schwarzberg@usdoj.gov), and Annie Wells (annie.wells@usdoj.gov); and (iv) any parties required to be served under any applicable Bankruptcy Rule or Local Rule. **The deadline by which objections to entry of the Consent Order must be filed and received by the Notice Parties is July 2, 2025 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").**

PLEASE TAKE FURTHER NOTICE, that if no responses or objections are received by the Objection Deadline, the Consent Order may be entered without further notice or a hearing. If an objection is filed, you may be notified of a hearing to consider the requested relief.

Dated: June 25, 2025
New York, New York

SCARINCI HOLLENBECK, LLC
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By: /s/ David Edelberg
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